

IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO.: 4:05-889
)	
vs.)	
)	
EZEKIEL DENNISON)	

UNITED STATES' MOTION FOR REDUCTION OF SENTENCE

NOW COMES the United States, by and through its undersigned counsel, and pursuant to Rule 35(b) of the Federal Rules of Criminal Procedure, moves this Court for a reduction of the Defendant's sentence imposed on October 11, 2006.

On January 30, 2006, Ezekiel Dennison pled guilty to conspiracy to distribute 50 grams or more of crack cocaine, in violation of Title 21, United States Code, Section 846. On October 11, 2006, Dennison was sentenced to 192 months imprisonment after receiving a downward departure.

The Government is prepared to show that the Defendant has provided unrewarded substantial assistance to the Government which conforms to the guidelines and policy statements issued by the United States Sentencing Commission pursuant to Title 28, United States Code, Section 994. As a basis for such motion, the Government would show that Dennison provided information about the unlawful activities of other individuals. In particular, Dennison provided information regarding the drug distribution activities of a significant drug supplier, Dangelo Gause, as well as the distribution activities of Larry Wilson and Timothy Dicker, all of whom were indicted federally and have pled guilty. The Government believes that Dennison's cooperation against Gause, Wilson, and Dicker contributed to the successful prosecution of those defendants. The Government will provide more specific information regarding Dennison's cooperation at the time of his hearing.

For these reasons, the Government requests that the Court grant this motion and reduce Dennison's sentence pursuant to Rule 35(b).

Respectfully submitted,

WILLIAM N. NETTLES
UNITED STATES ATTORNEY

By: /s/ A. Bradley Parham
A. BRADLEY PARHAM
Assistant United States Attorney

January 18, 2013

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO.: 4:05-889
)	
vs.)	
)	CERTIFICATE OF SERVICE
EZEKIEL DENNISON)	

I hereby certify that as attorney of record I have caused Laura H. Brown, legal assistant, to serve on January 18, 2013 rect copy of the attached **UNITED STATES' MOTION FOR REDUCTION OF SENTENCE** via the court's e-noticing system, but if that means failed, then by mailing through the United States mail, postage paid, the same on the following person:

Ezekiel Dennison
Prisoner No.: 13505-171
USP Beaumont
P. O. Box 26030
Beaumont, TX 77720

/s/ A. Bradley Parham
A. BRADLEY PARHAM

Florence, S.C.
January 18, 2013